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MEMO ENDORSED

USDS SDNY
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 Attorneys and Counsellors at Law
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Honorable P. Kevin Castel
 United States Courthouse
 500 Pearl Street
 New York, New York 10007-1312

May 26, 2011

Re: Illinois National Insurance Company, The Insurance Company
 of the State of Pennsylvania, and National Union Fire
 Insurance Company Of Pittsburgh, Pa (collectively, "Plaintiffs")
 v. Tutor Perini Corp.
Index No. 11-cv-00431 (PKC)

Dear Judge Castel:

We represent Defendant Tutor Perini Corporation ("Tutor Perini") in the above referenced matter. Pursuant to section 1(C) of your Honor's Individual Practices, this letter serves to request a further extension of time for Tutor Perini to respond to the Complaint.

There have been three previous extensions of time with respect to the deadline to respond to the Complaint. The first extension (from February 15, 2011 to March 17, 2011) was based on Tutor Perini's request for additional time to engage counsel and evaluate the Complaint. The second extension (from March 17, 2011 to March 31, 2011) and third extension (from March 31, 2011 to May 30, 2011) were requested by the parties in order to permit time to continue settlement discussions which may lead to a resolution of this action. Based on the status of those continued settlement discussions, however, in order to reach any resolution of the issues involved in this matter the parties believe that additional time will likely be required beyond the current May 30, 2011 deadline. Accordingly, the parties respectfully request a short ten day extension of time – from May 30, 2011¹ to June 10, 2011 – for Tutor Perini to respond to the Complaint, and further request that the Rule 16 Conference currently scheduled for June 7, 2011 be postponed to a date convenient for the Court after June 10, 2011.

¹ As May 30, 2011 is a public holiday, Tutor Perini's time to answer would have been May 31, 2011. The ten day extension of time is calculated from May 31, 2011.

NYDOCS1-968687.1

New York, NY ■ Newark, NJ ■ Philadelphia, PA ■ Ventura, CA ■ Washington, DC ■ Stamford, CT

*Time to answer
 or move extended
 to June 10.
 Conference
 advanced from
 June 7 to
 June 10
 at 12pm*

SO ORDERED


[Signature]
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 5-26-11

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Plaintiffs have reviewed this letter and join in this request. This current requested extension will not affect any other scheduled dates.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Finley T. Harckham". To the right of the signature is a small circle containing the initials "VP".

Finley T. Harckham

cc: Joshua W. Gardner (by email)
John D. Hughes (by email)